

2:16-cv-4164 JFB-AKT

United States District Court
for the
Eastern District of New York

MICHAEL W. MCDEVITT,

Plaintiff

—v—

**SUFFOLK COUNTY, SUFFOLK COUNTY POLICE DEPARTMENT,
SUFFOLK COUNTY POLICE OFFICER GLENN TARQUINIO, in his
individual and official capacity,
SUFFOLK COUNTY POLICE OFFICER ALEJANDRO SANCHEZ, in his
individual and official capacity, and
SUFFOLK COUNTY POLICE OFFICERS “JOHN DOE AND JANE
DOE” ## 1–10 in their individual and official capacities,**

Defendants

**DEMAND FOR IDENTIFICATION AND
PRODUCTION OF RULE 30(b)(6) WITNESS
NOTICE TO TAKE ORAL DEPOSITION**

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PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure Rule 30(b)(6), Plaintiff will take the deposition upon oral examination under oath of the designated representative(s) of the Suffolk County Police Department. The deposition will be taken before a notary public or other person authorized by law to administer oaths, will be stenographically recorded and videotaped, will take place at a time and place agreed upon by Counsel and shall continue from day to day until completed. Such deposition will be taken for the purposes of discovery, for use as evidence at a trial, and for any other permissible purpose under the Federal Rules of Civil Procedure and Federal Rules of Evidence.


Pursuant to Rule 30(b)(6), the Suffolk County Police Department is requested to identify and make available for deposition those officers, directors, managing agents, or other persons who consent to testify on its behalf with respect to matters known or reasonably available to it with respect to the following matters:

1. the policies, practices, and procedures which must be followed by the Suffolk County Police Department with respect to the investigation of civilian complaints against police officers pre-2014 and post-2014;
2. the policies, practices, and procedures of the Suffolk County Police Department with respect to the results of those pre-2014 and post-2014 investigations;
3. the statistics, charts, graphs, spreadsheets and/or other data collection/data visualization of the number of civilian complaints filed against police officers pre-2014 and post-2014;
4. the statistics, charts, graphs, spreadsheets and/or other data collection/data visualization with respect to the disposition of the civilian complaints against individual police officers pre-2014 and post-2014;
5. all civilian complaints filed against the named police officers in this matter;
6. the disposition of those complaints filed against the named police officers in this matter;

7. all materials produced and/or used with reference to the investigation of all civilian complaints against the above named police officers;
8. the names, addresses, and contact information of any investigator who investigated civilian complaints against the above named police officers;
9. the reasons civilian complaints were filed against the above named police officers;
10. all procedures and/or rules that Suffolk County Police Department must follow regarding the reporting and investigation of civilian complaints against Suffolk County Police Officers;
11. the procedures and/or rules Suffolk County Police Department must follow for notifying a police officer named in a civilian complaint;
12. the rules and procedures which must be followed concerning the investigation of civilian complaints;
13. all changes of the rules and procedures governing an investigation of a civilian complaint;
14. the reasons for or why a rule or procedure governing the investigation of a civilian complaint was changed;
15. the process by which the Suffolk County Police Department amends its rules and procedures that must be followed regarding the investigation and reporting of civilian complaints;
16. the rules and procedures for maintaining and storing materials created and/or received during an investigation of a civilian complaint against police officers;
17. the procedures, rules, and/or actions the Suffolk County Police Department has taken to reduce the number of civilian complaints filed;
18. the procedures and/or rules established by Suffolk County Police Department for punishing and/or reprimanding police officers who have civilian complaints filed against them;

19. the steps taken by Suffolk County Police Department to reprimand and/or correct the behavior of the above named police officers regarding any and all civilian complaints filed against them;
20. the policies, rules, and/or procedures followed by the Suffolk County Police Department to correct officer behavior that gives rise to civilian complaints;
21. the policies, rules, and/or procedures which the Suffolk County Police Department must enforce to properly investigate civilian complaints against its police officers;
22. The employees, officers, and/or agents within the Suffolk County Police Department responsible for conducting investigations of civilian complaints against police officers; and
23. investigation records, materials, documents, memorandums, and/or other documentation resulting from the investigation of the civilian complaints filed relating to this matter.

DATED AT Dix Hills, New York
18 September 2018



CORY H. MORRIS (CM 5225)

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